



# MAYOR AND COUNCIL AGENDA

NO. /4

DEPT.: Community Planning and Development Services DATE: December 29, 2004  
Contact: Scott E. Parker, AICP, Planner III

**ACTION:** Public Hearing to amend the Zoning Ordinance (Text Amendment TXT2004-00213), to amend Article XIV of the Zoning Ordinance to add a new section: Section 25-710.28, Preliminary Development Plan Optional Method of Development. Washington Area Metropolitan Transit Authority (WMATA) and Twinbrook Commons, L.L.C. applicants.

**ACTION STATUS:**

**FOR THE MEETING OF:** 01/10/05

INTRODUCED

PUB. HEARING

INSTRUCTIONS

APPROVED

EFFECTIVE

**ROCKVILLE CITY CODE,**

CHAPTER

SECTION

☐ CONSENT AGENDA

**RECOMMENDATION:** Conduct Public Hearing and hold the public record open for a period of two weeks until 5:00pm, January 24.

**IMPACT:** ☐ Environmental ☐ Fiscal ☒ Neighborhood ☐ Other:

Impact will be related to the amendment of the Zoning Ordinance, facilitating development of the Twinbrook Metro Station site, commonly referred to as Twinbrook Commons.

**BACKGROUND:** Twinbrook Commons L.L.C. and WMATA have entered into a joint development agreement to develop the 26-acre WMATA owned property at the Twinbrook Metro Station. The applicant is proposing a mixed-use residential, office, and retail transit oriented development. Currently, 16.18 acres of the project are in Montgomery County. The portion of the proposed development within the City is 8.36 acres, with all but 1.77 acres of the City portion on the west side of the CSX and Metro tracks. The 1.77- acre piece within the City of Rockville on the east side of the tracks is commonly referred to as the Suburban Propane site.

It should be noted that the applicant has filed an annexation petition to incorporate all of the development area currently within Montgomery County into the City of Rockville. It should also be noted that Montgomery County has approved a Preliminary Development plan and a Phase I Site Plan for the development within the jurisdiction of Montgomery County.

The Planning Commission considered this application at their meeting of December 14, 2004, and their recommendation is attached (Attachment 2).

**PROPOSAL:**

The applicant has requested this text amendment to provide an alternative method of optional development within the RPC zones for large tracts of land located in close proximity to a metro station entrance. The following are germane and relevant items associated with the text amendment:

Application

1. Minimum of ten acres
2. Located within 1,200 feet of a Metro station entrance
3. RPC zone

Process

1. Approval of a Preliminary Development Plan (PDP) for the entire site by the Mayor and Council
2. Subsequent approval of Use Permits for individual phases by the Planning Commission

Preliminary Development Plan Approval

1. PDP indicating uses, densities, heights and general locations of uses and roads
2. Trip Reduction Agreement
3. Twelve-year Adequate Public Facilities Validity period

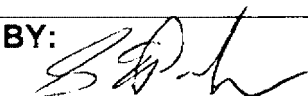
Development Standards

1. Residential and commercial uses required, with a minimum of ten percent ground floor retail
2. Maximum density of 1.0 FAR for nonresidential development and 66 dwelling units per acre..
3. Maximum heights for residential structures – 170 feet if 300 feet or more from single family detached residential property; otherwise 140 feet
4. Maximum height for commercial structures – 170 feet if 300 feet or more from single family detached residential property; otherwise 110 feet.
5. Setbacks from off-site, single family detached residential units – one foot for every three feet of height.

**STAFF COMMENT:**

Twinbrook Commons and WMATA are applying for this amendment to facilitate development of the Twinbrook Metro site. The provisions within this text amendment will give the applicant the flexibility to accommodate the development commensurate with approvals that are already in place within the County.

**PREPARED BY:**

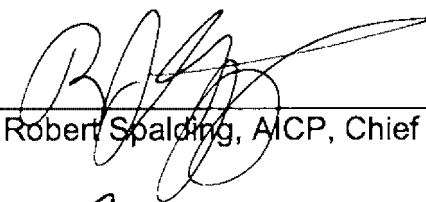


Scott E. Parker, AICP, Planner III

12.29.04

Date

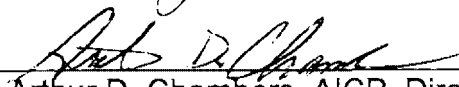
**APPROVE:**



Robert Spalding, AICP, Chief of Planning

1.3.5

Date



Arthur D. Chambers, AICP, Director of CPDS

1/3/05

Date



Scott Ullery, City Manager

1/05/05

Date

**LIST OF ATTACHMENTS:**

1. Updated Text Amendment
2. Staff Memo
3. Planning Commission Recommendation

**Text Amendment TXT2004-00213**

Twinbrook Commons

January 4, 2005

ATTACHMENT

Amend Sec.25-311 Tables of Development Standards by adding a column to the Development Standards for Rockville Pike Corridor Area table to indicate the following maximum residential density in the RPC and RPR zones.

RPC – 60 dwelling units per acre (8)

RPR – 60 dwelling units per acre

(8) Residential density may be increased to 66 dwelling units per acre on properties developed under Sec. 25-710-28 Twinbrook Metro Performance District Optional Method of Development.

Amend Article XIV Rockville Pike Corridor Area to add new section as follows:

**Sec. 25-710-28. Twinbrook Metro Performance District Preliminary Development Plan Optional Method of Development.**

Use of the Twinbrook Metro Performance District Preliminary Development Plan Optional Method of Development is a voluntary option and an alternative to Section 25-710.27 for large tracts of land in the RPC Zone located within close proximity to a WMATA Metro Station, where multiple buildings are planned to be developed over a long period of time. The Twinbrook Metro Performance District Preliminary Development Plan Optional Method is intended as an alternative to the optional method set forth in Section 25-710.27. Submission of an preliminary development plan application under the optional method commits the applicant to a greater degree of development control authority by the Mayor and Council. The Mayor and Council may grant additional building height and flexibility where a development complies with more extensive standards of urban design review and traffic impact review and mitigation. Any development that receives approval may exceed the normal building height and F.A.R. specified in Table III contained in Section 25-311 of this chapter, provided that in no event shall the resulting building exceed the maximum height and F.A.R. specified in this section. Developments submitted for approval under the optional method of development shall be subject to the following modifications and requirements:

(1) All land processed under this Twinbrook Metro Performance District Preliminary Plan Optional Method must be located within 1,200 feet of a main pedestrian portal of a WMATA Metro Station;

(2) A minimum area of ten (10) acres shall be required for applications under the Twinbrook Metro Performance District Preliminary Development Plan Optional Method;

(3) All applicants shall prepare and submit a traffic impact study and shall provide mitigation of traffic impacts which may be acceptable to the Mayor and Council. All traffic mitigation efforts and traffic obligations to be required by an applicant shall be identified in full at the time of ~~Twinbrook Metro Performance District~~ preliminary development plan approval. For purposes of this Section, a determination of adequate public facilities is timely and remains valid for twelve (12) years from the date of the approval of a ~~Twinbrook Metro Performance District Preliminary Development Plan~~ preliminary development plan. The Mayor and Council may extend the validity period of the adequate public facilities determination prior to its expiration for good cause, taking into consideration the extent to which the project is completed and the degree of development activity that has occurred within four years of the extension request;

(4) All developments shall comply with the urban design review process for the Rockville Pike Corridor Area as contained in the Plan in connection with Use Permit approval;

(5) All buildings abutting off-site residential land developed with single family detached units shall provide a minimum side and rear set back of one (1) foot for every three (3) feet of height;

(6) The area under Twinbrook Metro Performance District Optional Method~~Preliminary~~ development plan area must contain a mix of uses, including residential and commercial components. Ground floor retail uses must be provided in at least ten percent of the Twinbrook Metro Performance District Optional Method ~~Preliminary~~ development plan area's ground floor space that has street frontage. Nothing herein shall preclude parking structures from occupying ground floor space, provided that at least 70 percent of the street frontages of all of the parking facilities within the Twinbrook Metro Performance District Optional Method ~~Preliminary~~ development plan area are concealed by a separate occupiable building. For purposes of this subsection, the 70 percent calculation shall be based on the total street frontage of all parking structures. The Mayor and Council may authorize modification to this use requirement where the strict application would result in practical difficulty or unnecessary hardship upon the owners. Developments shall not be subject to the use requirements of Section 27-710.21;

(7) All developments shall provide a system of public pedestrian ways linking elements of the development with neighboring properties and the WMATA Metro Station;

(8) Additional heights may be authorized, as follows: 1) commercial building height of one hundred ten (110) feet, except that a maximum of one hundred seventy (170) feet may be permitted for a commercial building located at least 300 feet from a single family detached residential property; and 2) additional

residential building height of one hundred forty-five (145) feet; except that a maximum of one hundred seventy (170) feet may be permitted for a residential building located at least 300 feet from a single family detached residential property.

(9) All developments that provide right-of-way or easements for public streets or pedestrian ways may include the area of such right-of-way or easements in the net development area for the purpose of calculating F.A.R. and residential density;

(10) Development densities may be shifted within the Twinbrook Metro Performance District Optional Method ~~Preliminary~~ development plan gross tract area but in no event shall the commercial F.A.R. as calculated based on the gross tract area exceed 1.0 F.A.R. or 66 dwelling units per acre;

(11) Optional method approval shall be as provided for in Section 25-683 herein, ~~except that the Mayor and Council and not the Planning Commission shall be the sole authority with respect to the final approval of the RPC Preliminary Development Plan Optional Method, upon recommendation by the Planning Commission.~~ All Use Permits within the ~~Ppreliminary Ddevelopment Pplan~~ area shall be approved by the Planning Commission;

(12) Within the ~~Preliminary Development Plan~~ Twinbrook Metro Performance District Optional Method area, the office and retail parking space quantity requirements governing the Rockville Pike Corridor Area as set forth in Section 25-710.27 (9) (a) and (b) shall apply. The parking space requirements for all other uses shall be as provided for in Section 25-395, except the minimum parking space requirements for residential uses for multi-family dwelling units shall be as follows: For each dwelling unit with one separate bedroom or less, one (1) space; for each dwelling unit with 2 separate bedrooms, one and one quarter (1¼) spaces; for each dwelling unit with 3 or more separate bedrooms, two (2) spaces;

(13) Parking required in connection with the approval of a Use Permit need not be located within the boundaries of the subject Use Permit but must be located within the ~~Preliminary Development Plan area~~ Twinbrook Metro Performance District Optional Method area;

(14) All developments shall be subject to the parking design standards set forth in Article IX, Division 2, except that the parking space design standards for parking spaces within a WMATA controlled garage intended for Metro Station commuter parking shall be governed by the design standards approved and adopted by WMATA as follows:

(a) Each automobile parking space shall be a rectangle not less than eight and one-half (8½) feet wide and eighteen feet long;

(b) The width of interior driveways shall not be less than twenty-four (24) feet when used with seventy (70) to ninety (90) degree angled parking;

(15) Shadow studies generally based on the methodology set forth in the Rockville Pike Neighborhood Corridor Plan shall be approved by the Mayor and Council in connection with its approval of the ~~P~~preliminary ~~D~~development ~~P~~lan and shall seek to minimize the impacts of shadows on surrounding off-site single-family residential units;

(16) All developments that abut Rockville Pike shall provide a landscaped berm, walkway, splash block treatments and building landscaping along the Rockville Pike frontage in substantial accordance with the Rockville Pike Streetscape guidelines contained in the Plan.

(17) The Mayor and Council may, in connection with the approval of a ~~P~~preliminary ~~D~~development ~~P~~lan, approve housing for the elderly and physically handicapped. Such approval by the Mayor and Council shall eliminate the requirement to obtain special exception approval for housing for the elderly and physically handicapped as provided for by Section 25-296.

Note: Underlined text added on ~~December 29~~ January 4, 2005, 2004

January 4, 2005  
# 1857295 v4



City of Rockville

## MEMORANDUM

December 8, 2004

ATTACHMENT 2

TO: City of Rockville Planning Commission

FROM: Scott Parker, AICP, Planner II *[Signature]*

VIA: Bob Spalding, AICP, Chief of Planning *[Signature]*

SUBJECT: Proposed Zoning Text Amendment TXT2004-00213; To amend Article XIV, Rockville Pike Corridor Area, to create new section 25-710-28. Text Amendment is to facilitate development of the Twinbrook Commons Development. ALSO: Minor Correction to ZTA-27-04 regarding Optional Method of Development in the Rockville Pike Corridor Area.

### BACKGROUND

The Zoning Ordinance provides for the Mayor and Council to review new text amendment applications to determine if further consideration of the application is appropriate. Those deemed appropriate are referred to the Planning Commission for review and recommendation (Section 25-143(b)).

The applicants for this text amendment, the Washington Metropolitan Area Transit Administration (WMATA), and the JBG Companies, have also applied for Preliminary Development Plan (PDP) PDP2004-00009, Annexation Petition ANX2004-00136, and MAP2004-00090, all of which are related requests regarding the preliminary plan approval of the Twinbrook Commons development. Twinbrook Commons is a proposed 26-acre development at the site of the Twinbrook Metro station. Currently, the proposal has 16.95 acres within Montgomery County jurisdiction. This is the area that is the subject of the annexation petition. The Map Amendment will change the zoning of the Montgomery County portion upon annexation, change the zoning of the 1.77-acre Suburban Propane parcel (the only part of the development proposal within the City of the east side of the tracks), and re-affirm the RPC zoning of the portion of the development within the City on the west side of the tracks.



## ANALYSIS

This text amendment, which is attached for review (Attachment 2), will effectively establish a new section of the Ordinance related to developments in close proximity to the Twinbrook Metro Station.

As previously stated, the applicants are also proposing a PDP for the redevelopment of the site, which will be reviewed currently with this text amendment request.

The following are the relevant highlights of the text amendment:

### Application

1. Minimum of ten acres
2. Located within 1,200 feet of a Metro station entrance
3. RPC zone

### Process

1. Approval of a Preliminary Development Plan (PDP) for the entire site by the Mayor and Council
2. Subsequent approval of Use Permits for individual phases by the Planning Commission

### Preliminary Development Plan Approval

1. PDP indicating uses, densities, heights and general locations of uses and roads
2. Trip Reduction Agreement
3. Twelve-year Adequate Public Facilities validity period

### Development Standards

1. Residential and commercial uses required, with a minimum of ten percent ground floor retail
2. Maximum commercial density of 1.0 FAR.
3. Maximum heights for residential structures—170 feet if 300 feet or more from single family detached residential property; otherwise 140 feet
4. Maximum height for commercial structures—170 feet if 300 feet or more from single family detached residential property; otherwise 110 feet.
5. Setbacks from off-site, single family detached residential units—one foot for every three feet of height.

## RECOMMENDATION

Staff recommends approval of the text amendment. We believe that the flexibility provided within this new section will create the flexibility needed to create vibrant communities within the Metro station areas.

**ADDITIONAL ITEM:**

Staff notes that a minor correction is required for Ordinance number 27-04, which amended the section of the Ordinance related to Optional Method approvals. Section 25-710.30(b)(2) should be modified as follows:

"The particular dimensions, grade and orientation of the site, and the location and height of existing and proposed development in the **Town Center Planning Area.**"

To read as:

"The particular dimensions, grade and orientation of the site, and the location and height of existing and proposed development in the **Rockville Pike Corridor Area.**"

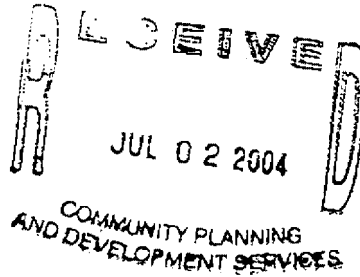
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Attachments: 1. Applicant letter  
2. Proposed Text Amendment Language

# HOLLAND & KNIGHT LLP

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\*\*Representative Office

June 29, 2004

PATRICIA A. HARRIS  
301-215-6613  
paharris@hklaw.com

## VIA HAND DELIVERY

The Honorable Larry Giammo and  
Members of the City Council  
City Hall  
City of Rockville  
111 Maryland Avenue  
Rockville, Maryland 20850

Re: Proposed Zoning Text Amendment – RPC Zone, Preliminary Development Plan  
Optional Method of Development

Dear Mayor Giammo and Members of the City Council:

Enclosed please find an application for a Zoning Text Amendment to provide for a Preliminary Development Plan Optional Method of Development in the RPC Zone. Also enclosed please find a Statement of Justification. The total filing fee is \$6,000. We have included a check for \$3,500. It is our understanding that the remaining \$2,500 will be credited from the Zoning Text Amendment that was filed in April 2003 and never processed. As explained in detail in the Statement of Justification, the Zoning Text Amendment is intended to facilitate transit oriented development in those areas within close proximity to a WMATA Metro Station.

We look forward to your consideration of this Zoning Text Amendment and working with the Mayor and Council and the City staff on this effort.

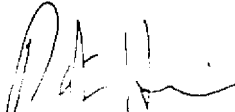
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X

The Honorable Larry Giammo  
June 29, 2004  
Page 2

Very truly yours,

HOLLAND & KNIGHT LLP



Patricia A. Harris

Enclosures

cc: Mr. Bob Spalding  
Mr. Scott Parker  
Mr. Rod Lawrence  
Ms. Rosalyn Doggett

# 1936781\_v1

(9)

~~(Z)~~

Amend Article XIV Rockville Pike Corridor Area to add new section as follows:

**Sec. 25-710-28. Preliminary Development Plan Optional Method of Development.**

Use of the Preliminary Development Plan optional method of development is a voluntary option and an alternative to Section 25-710.27 for large tracts of land in the RPC Zone located within close proximity to a WMATA Metro Station, where multiple buildings are planned to be developed over a long period of time. The Preliminary Development Plan Optional Method is intended as an alternative to the optional method set forth in Section 25-710.27. Submission of an application under the optional method commits the applicant to a greater degree of development control authority by the Mayor and Council. The Mayor and Council may grant additional building height and flexibility where a development complies with more extensive standards of urban design review and traffic impact review and mitigation. Any development that receives approval may exceed the normal building height and F.A.R. specified in Table III contained in Section 25-311 of this chapter, provided that in no event shall the resulting building exceed the maximum height and F.A.R. specified in this section. Developments submitted for approval under the optional method of development shall be subject to the following modifications and requirements:

(1) All land processed under this Preliminary Plan Optional Method must be located within 1,200 feet of a main pedestrian portal of a WMATA Metro Station;

(2) A minimum area of ten (10) acres shall be required for applications under the Preliminary Development Plan Optional Method;

(3) All applicants shall prepare and submit a traffic impact study and shall provide mitigation of traffic impacts which may be acceptable to the Mayor and Council. All traffic mitigation efforts and traffic obligations to be required by an applicant shall be identified in full at the time of Preliminary Development Plan approval. For purposes of this Section, a determination of adequate public facilities is timely and remains valid for twelve (12) years from the date of the approval of a Preliminary Development Plan. The Mayor and Council may extend the validity period of the adequate public facilities determination prior to its expiration for good cause, taking into consideration the extent to which the project is completed and the degree of development activity that has occurred within four years of the extension request;

(4) All developments shall comply with the urban design review process for the Rockville Pike Corridor Area as contained in the Plan in connection with Use Permit approval;

(5) All buildings abutting off-site residential land developed with single family detached units shall provide a minimum side and rear set back of one (1) foot, for every three (3) feet of height;

(6) The Preliminary Development Plan area must contain a mix of uses, including residential and commercial components. Ground floor retail uses must be provided in at least ten percent of the Preliminary Development Plan areas' ground floor space that has street frontage. Nothing herein shall preclude parking structures from occupying ground floor space, provided that at least 70 percent of the street frontages of all of the parking facilities within the Preliminary Development Plan area are concealed by a separate occupiable building. For purposes of this subsection, the 70 percent calculation shall be based on the total street frontage of all parking structures. The Mayor and Council may authorize modification to this use requirement where the strict application would result in practical difficulty or unnecessary hardship upon the owners. Developments shall not be subject to the use requirements of Section 27-710.21;

(7) All developments shall provide a system of public pedestrian ways linking elements of the development with neighboring properties and the WMATA Metro Station;

(8) Additional heights may be authorized, as follows: 1) commercial building height of one hundred ten (110) feet, except that a maximum of one hundred seventy (170) feet may be permitted for a commercial building located at least 300 feet from a single family detached residential property; and 2) additional residential building height of one hundred forty-five (145) feet; except that a maximum of one hundred seventy (170) feet may be permitted for a residential building located at least 300 feet from a single family detached residential property.

(9) All developments that provide right-of-way or easements for public streets or pedestrian ways may include the area of such right-of-way or easements in the net development area for the purpose of calculating F.A.R.;

(10) Development densities may be shifted within the Preliminary Development Plan gross tract area but in no event shall the commercial F.A.R. as calculated based on the gross tract area exceed 1.0 F.A.R.;

(11) Optional method approval shall be as provided for in Section 25-683 herein, except that the Mayor and Council and not the Planning Commission shall be the sole authority with respect to the final approval of the RPC Preliminary Development Plan Optional Method, upon recommendation by the Planning Commission. All Use Permits within the Preliminary Development Plan area shall be approved by the Planning Commission;

(12) Within the Preliminary Development Plan area, the office and retail parking space quantity requirements governing the Rockville Pike Corridor Area as set forth in Section 25-710.27 (9) (a) and (b) shall apply. The parking space requirements for all other uses shall be as provided for in Section 25-395, except the minimum parking space requirements for residential uses for multi-family dwelling units shall be as follows: For each dwelling unit with one separate bedroom or less, one (1) space; for each dwelling unit with 2 separate bedrooms, one and one quarter (1¼) spaces; for each dwelling unit with 3 or more separate bedrooms, two (2) spaces;

(13) Parking required in connection with the approval of a Use Permit need not be located within the boundaries of the subject Use Permit but must be located within the Preliminary Development Plan area;

(14) All developments shall be subject to the parking design standards set forth in Article IX, Division 2, except that the parking space design standards for parking spaces within a WMATA controlled garage intended for Metro Station commuter parking shall be governed by the design standards approved and adopted by WMATA as follows:

(a) Each automobile parking space shall be a rectangle not less than eight and one-half (8½) feet wide and eighteen feet long;

(b) The width of interior driveways shall not be less than twenty-four (24) feet when used with seventy (70) to ninety (90) degree angled parking;

(15) Shadow studies generally based on the methodology set forth in the Rockville Pike Neighborhood Corridor Plan shall be approved by the Mayor and Council in connection with its approval of the Preliminary Development Plan and shall seek to minimize the impacts of shadows on surrounding off-site single-family residential units;

(16) All developments that abut Rockville Pike shall provide a landscaped berm, walkway, splash block treatments and building landscaping along the Rockville Pike frontage in substantial accordance with the Rockville Pike Streetscape guidelines contained in the Plan.

(17) The Mayor and Council may, in connection with the approval of a Preliminary Development Plan, approve housing for the elderly and physically handicapped. Such approval by the Mayor and Council shall eliminate the requirement to obtain special exception approval for housing for the elderly and physically handicapped as provided for by Section 25-296.

December 8, 2004  
# 1857295\_v4



City of Rockville


## MEMORANDUM

December 16, 2004

ATTACHMENT 3

TO: Mayor and Council

FROM: Planning Commission

VIA: Scott E. Parker, AICP, Planner III 

SUBJECT: Planning Commission Recommendation Regarding Twinbrook Commons  
Applications: Annexation petition ANX2004-00136; Sectional Map Amendment  
MAP2004-00090; Text Amendment TXT2004-00213; Preliminary Development  
Plan PDP2004-00009

On December 15, 2004, the Planning Commission, at a regularly scheduled and advertised meeting, reviewed and provided recommendations to the Mayor and Council on the items referenced above, as provided in the Ordinance. The Planning Commission considered all of the applications referenced above together, and provided one comprehensive recommendation.

Concerning the first item referenced above, application ANX2004-00136, the Planning Commission conducted a public hearing regarding the annexation of 16.95-acres of property associated with the Twinbrook Commons development. These 16.95 acres are currently under the jurisdiction of Montgomery County. This public hearing item was conducted first, and five members of the public spoke to the application. The response was generally favorable.

The following items, which were considered together, were as follows:

MAP2004-00090—A sectional Map amendment to change the zoning of the 16.95-acres of land to be annexed; to change the zoning of the 1.77-acre Suburban Propane property from I-2 to RPC; and to reaffirm existing RPC zoning on portions of the property adjacent to Chapman Avenue.

TXT2004-00213—Text Amendment to amend Article 14, creating a new Section 25-710-28, creating an optional method of development for proposals near the Twinbrook Metro station.



Page 2  
December 16, 2004

PDP2004-00009- Preliminary Development Plan (PDP) for the development of the Metro site.

The Planning Commission voted 6-0 to recommend approval of all the applications of the proposal. Specific comments from the individual commissioners are noted below.

Commissioner Johnson started the deliberations, stating that the concept is terrific, and is looking forward to the use permits to look at the proposal's details.

Commissioner Holz echoed Mr. Johnson's comments, adding that he commended the applicant for its outreach efforts to the community. He also stated that everyone is worried about traffic, but that Smart Growth starts at the Metro.

Commissioner Mullican stated that she has always supported this project, and has been impressed with the support and reasonableness of the Twinbrook Citizens Association (TCA). She stated that traffic was going to increase no matter what, and that this was a good development.

Commissioner Ostell stated that she supported the proposals. She further stated that the Montrose (and perhaps other) neighborhoods should have more input. Although expressing some concern over the project, she did compliment the applicant on their design and environmentally sensitive features.

Commissioner Britton also complimented the applicant on its outreach efforts and stated that the field visit was very helpful. He further stated that cut-through traffic should be addressed.

Chairman Hilton commented last, stating that the proposal contained a lot of positives. He also stated that an awful lot of residential units are coming online, and that at some point the City will need to address the issue of adequacy of fire protection through any APFO discussions.

/sep